

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DR. LAWRENCE P. RUDOLPH, D.D.S. and ,
CAMELBACK CONSULTING, LLC.

Plaintiffs,

v.

PAUL BABAZ,

Defendant.

Consolidated at 2:12-CV-01710-ASJ

Hon. Arthur J. Schwab

DECLARATION OF PAUL BABAZ

AND NOW comes the Defendant Paul Babaz, by and through his undersigned counsel,
and submits the within Declaration:

1. I only have access to revenue records for the trailing 12 months regarding Morgan Stanley accounts I manage.
2. In the past 12 months, Morgan Stanley accounts I manage that relate to persons living in Pennsylvania represent 0.0009% of the total revenue generated from all account assets I manage as a Morgan Stanley employee.
3. In the past 12 months, I have generated \$1,470.56 in fees and commissions for Morgan Stanley from accounts related to persons living in Pennsylvania.
4. The portion of that \$1,470.56 that flows through to me is significantly less.
5. In the past 12 months, I have generated \$1,615, 244.81 in fees and commissions for Morgan Stanley from all accounts handled by me.
6. I have never advertised in, or solicited work from, Pennsylvania.
7. I have never visited or met any past or current clients, including Mr. Rudolph, in Pennsylvania on Morgan Stanley business.



8. I have never been in Pennsylvania related to any business of the Safari Club International.

9. Statements which are mailed to Morgan Stanley clients whose accounts I manage are sent from Morgan Stanley offices in New York or New Jersey. I do not direct or mail account-related statements.

I, Paul Babaz, the Defendant herein, states that the averment of facts contained in foregoing Declaration are true upon my personal knowledge, information and belief and that the statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities. I state under penalty of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746 relating to unsworn declarations under penalty of perjury.

Date:

30 May 13

By:

Paul Babaz

